

Oct 18, 2024

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RISLEY ROBERT BRADSHAW,

Defendant.

4:24-CR-6029-MKD

INDICTMENT

Vio: 18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Distribution of Child Pornography
(Count 1)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Receipt of Child Pornography
(Count 2)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)
Possession of Child Pornography
(Count 3)

18 U.S.C. § 2253
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about December 12, 2018, and November 17, 2020, in the
Eastern District of Washington, the Defendant, RISLEY ROBERT BRADSHAW,
did knowingly distribute child pornography, as defined in 18 U.S.C. § 2256(8)(A),

1 that had been mailed, shipped and transported in and affecting interstate and
2 foreign commerce by any means, including by computer, and that was transported
3 via any means or facility of interstate and foreign commerce, to wit: still images
4 depicting minor and prepubescent children engaging in sexually explicit conduct,
5 including, but not limited to, actual and simulated intercourse and the lascivious
6 exhibition of the genitals and pubic area, as defined in 18 U.S.C. § 2256(2)(A), all
7 in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).
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11 COUNT 2

12 Between on or about December 12, 2018, and November 17, 2020, in the
13 Eastern District of Washington, the Defendant, RISLEY ROBERT BRADSHAW,
14 did knowingly receive child pornography, as defined in 18 U.S.C. § § 2256(8)(A),
15 that had been mailed, shipped and transported in and affecting interstate and
16 foreign commerce by any means, including by computer, and that was transported
17 via any means or facility of interstate and foreign commerce, to wit: still images
18 depicting minor and prepubescent children engaging in sexually explicit conduct
19 including, but not limited to, actual and simulated intercourse and the lascivious
20 exhibition of the genitals and pubic area, as defined in 18 U.S.C. § 2256(2)(A), all
21 in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).
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COUNT 3

On or about November 24, 2020, in the Eastern District of Washington, the Defendant, RISLEY ROBERT BRADSHAW, did knowingly possess material that contained one or more visual depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A), including images of prepubescent minors and minors who had not attained twelve years of age, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct; which had been mailed, shipped and transported in, or using any means or facility of, interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce, by any means including computer, all in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

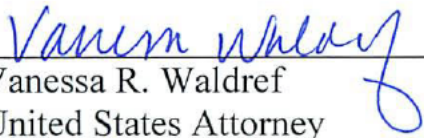
Pursuant to 18 U.S.C. § 2253, upon conviction of a violation of 18 U.S.C. § 2252A as set forth in this Indictment, the Defendant, RISLEY ROBERT BRADSHAW, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual

1 depiction, which was produced, transported, mailed, shipped or received in
2 violation of this chapter; any property, real or personal, constituting or traceable to
3 gross profits or other proceeds obtained from such offenses; and, any property, real
4 or personal, used or intended to be used to commit or to promote the commission
5 of such offenses, or any property traceable to such property, including but not
6 limited to:
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- 8 - a Windows Vista Tower computer; and,
- 9 - a black PNY thumb drive.

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13 DATED this 16th day of October, 2024.

14 A TRUE BILL

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21 Vanessa R. Waldref
22 United States Attorney

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25 Brandon L. Pang *for*
26 Assistant United States Attorney